

**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

**JESSICA NAYVELT, and
ERICA NAYVELT**

Plaintiffs,

Case No. 2014-CV-06952

vs.

HON. RUBEN CASTILLO

FRONTIER AIRLINES

Defendant.

**PLAINTIFF'S MOTION TO AMEND PRIOR ORDER OF THIS COURT
REGARDING SCHEDULING OF EARLY SETTLEMENT CONFERENCE**

NOW COMES the above-named Plaintiffs, JESSICA NAYWELT and ERICA NAYWELT, by their counsel of record, Attorney Vladimir M. Gorokhovsky of Gorokhovsky Law Office LLC and hereby moving this Honorable Court for an Order of Re-scheduling of the Time and Date of early settlement conference, which is now pending for November 20, 2014 at 2:00PM. In further support of this motion the undersigned counsel states as follows:

- (1) That on October 18, 2014 the undersigned counsel filed his clients request for early settlement conference.
- (2) That on October 18, 2014 this Court issued an Order scheduling early settlement conference for November 20, 2014 at 2:00PM.
- (3) That the undersigned counsel informed his clients accordingly, but was told that on November 20, 2014 both Plaintiffs will be pursuing their educational studies, and therefore will not be able to attend early settlement conference now pending for November 20, 2014 at 2:00PM.

(4) That the undersigned counsel was provided by the following alternatives days by his clients:

“Nov 24, 2014 at 1:00 PM or 2:00PM; or
Nov 26, 2014 at 1:00 PM or 2:00PM; or
Nov 28, 2014 at 1:00 PM or 2:00PM; or
Dec1,3,5,8,10,12, 2014 at 1:00 PM or 2:00PM; or
or any others Monday, Wednesday and Friday at 2:0PM”

(5) That furthermore, the day of November 20, 2014 is also is not suitable or the undersigned counsel, who is scheduled to attend the SPD Criminal Defense Conference in Milwaukee, Wisconsin.

(6). That, additionally, undersigned counsel also respectively requesting the leave of this Court to allow plaintiff's father, Steven Naywelt to be present in person and to attend to duly adjourned early settlement conference.

WHEREFORE, the above-named Plaintiffs, JESSICA NAYWELT and ERICA NAYWELT are in good faith respectfully requesting an Order of re-scheduling the above-identified settlement conference for any date and time as specified above.

Dated this Motion on this 3rd day of November 2014.

Respectfully submitted by
GOROKHOVSKY LAW OFFICE, L.L.C.
Attorney for Plaintiffs

Vladimir M. Gorokhovskiy, Esq.

BY: _____
/s/ VLADIMIR M. GOROKHOVSKY, LL.M.
WIS. SBN: 1036040

P.O. Business Address:

Gorokhovskiy Law Office, LLC
10919 N. Hedgewood Ln.,
Mequon, WI 53092
(414)-581-1582
gorlawoffice@yahoo.com